

5. At all times material hereto, defendant, Robert Hughes, individually and doing business as Hughes Investments, L.P., owned, managed, supervised and/or operated the restaurant located at 721 Cedar Crest Boulevard, Allentown, Pennsylvania.

6. At all times material hereto, defendant, McDonald's Corporation, was the franchisor of the aforementioned restaurant, and defendant, Robert Hughes, individually and doing business as Hughes Investments, L.P. was the franchisee of the aforesaid restaurant.

7. Jurisdiction is based upon the diversity of the parties: plaintiff resides in the State of New York; defendant, McDonald's Corporation's, has a principal residence in the State of Illinois; and defendant Robert Hughes, individually and doing business as Hughes Investments, L.P., is a resident of the Commonwealth of Pennsylvania.

8. On March 4, 2023, plaintiff was a patron and business invitee of defendants at their restaurant located at 721 Cedar Crest Boulevard, Allentown, Pennsylvania.

9. While in the restaurant, plaintiff unknowingly encountered water on the floor and was caused to slip and fall.

10. As a result of the foregoing, plaintiff was severely injured as more fully set forth below.

11. Defendants were careless and negligent by reason of the following:

- a) Maintaining a condition on the premises which they knew or had reason to know presented an unreasonable risk of harm to the plaintiff;
- b) Failing to inspect said premises adequately to insure the safety of the tenants in general and plaintiff in particular;
- c) Failing to warn plaintiff of a dangerous condition;
- d) Failing to hire and/or train competent personnel to manage, inspect and clean the floors of the aforementioned property so as to make them safe for their business invitees in general and plaintiff in particular.

12. As a result of her fall, plaintiff suffered severe and disabling injuries, some or all of which are permanent in nature including, not limited to, injuries to the cervical spine, lumbar spine and a shock to the nerves and nervous system.

13. Plaintiff continues to suffer great physical pain, serious and permanent injury and mental anguish; plaintiff has been and may continue to be prevented from attending to her usual activities, duties and occupations and has suffered and may continue to suffer a loss of hearing and hearing capacity, and plaintiff has incurred and may continue to incur various medical expenses in and about an effort to cure plaintiff of the aforesaid injuries.

WHEREFORE, plaintiff demands judgment against defendants in a sum in excess of Seventy-Five Thousand Dollars (\$75,000.00).

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